IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

TAO AN, CHUNGANG GUAN,)	
CUI QINGYUN, HUIMIN LIN,)	
BEILE LI, YANMING WANG,)	
TAO ZHENG, ZHENG HU,)	
YUAN CAO, LINWAN FENG,)	
)	
Plaintiffs,) Ci	vil Action No. 1:22-CV-10062
)	
V.)	
)	
LUC A. DESPINS,)	
PAUL HASTINGS LLP,)	
)	
Defendants.)	

PROPOSED FINAL JUDGMENT

- 1. WHEREAS, on August 2, 2023, this Court dismissed the above-referenced action, and awarded Defendants Luc A. Despins and Paul Hastings LLP (collectively, "Defendants") sanctions under Federal Rule of Civil Procedure 11 in the form of attorneys' fees and costs, to be imposed jointly and severally upon Plaintiffs and Plaintiffs' counsel, Richard Freeth and Yongbing Zhang. ECF No. 29.
- 2. WHEREAS, on August 11, 2023, Defendants filed an application for reasonable attorneys' fees and costs, ECF Nos. 30-32, and Judge Jennifer E. Willis granted the application on March 18, 2024, awarding Defendants a total of \$327,222.50 (reflecting \$326,379.50 in attorneys' fees and \$843 in costs). ECF No. 44.
- 3. WHEREAS, Plaintiffs appealed the fee award, ECF No. 45; the appeal was subsequently dismissed for lack of jurisdiction on August 13, 2024, and Plaintiffs' request for a stay and/or remand was denied. ECF No. 46.

Accordingly, IT IS HEREBY ADJUDGED, ORDERED, AND DECREED that Plaintiffs

and Plaintiffs' counsel, Richard Freeth and Yongbing Zhang, are jointly and severally liable for \$327,222.50 in attorneys' fees and costs, to be paid to Defendants. The Clerk of Court is respectfully directed to enter this Final Judgment immediately.

DATED this 3rd day of December, 2024

BY THE COURT:

Honorable Valerie E. Caproni UNITED STATES DISTRICT JUDGE